

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

ADELBERG RUDOW DORF &  
HENDLER LLC,

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## Judgment Creditor

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Case No.: MJG-01-CV-2600

WILLIAM BOND,

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## Judgment Debtor

**OPPOSITION OF JUDGMENT CREDITOR ADELBERG, RUDOW, DORF &  
HENDLER, LLC, TO JUDGMENT DEBTOR'S MOTION  
FOR PROTECTIVE ORDER**

Judgment Creditor Adelberg, Rudow, Dorf & Hendl, LLC (“Adelberg Rudow”), by its attorneys, Andrew Radding and Michael R. Severino, files this Opposition to Judgment Debtor’s Motion for Protective Order, and states as follows:

1. On or about July 17, 2003, Judgment Debtor, William C. Bond ("Bond"), filed the instant Motion seeking (1) the entry of a protective Order as to certain financial information, (2) that the deposition of Bond be held before a United States Magistrate Judge, (3) that the Court enter an Order limiting discovery, and (4) that subpoenas issued to Bond's counsel, Howard J. Schulman and Schulman and Kaufman, LLC, be quashed.

2. Adelberg Rudow does not oppose the entry of a protective Order; however, the protective Order proposed by Bond is inappropriate and unacceptable. Accordingly, Adelberg Rudow has submitted its own proposed protective Order.

3. Adelberg Rudow opposes any Order requiring Bond's deposition be held before a United States Magistrate Judge as nothing more than an unnecessary tactic utilized to evade and delay the depositions currently set for August 14 and 15, 2003.

4. Bond has not set forth any reason why there should be any limitation to the discovery available to Adelberg Rudow, which is simply attempting to execute on a judgment entered in its favor in the amount of \$69,350.44.

5. Pursuant to Local Rule 105.1, Adelberg Rudow hereby adopts and incorporates the attached Memorandum in support of this Opposition.

**WHEREFORE**, Adelberg, Rudow, Dorf & Hendl, LLC, hereby requests an entry of a protective Order in the form proposed by Adelberg, Rudow, Dorf & Hendl, LLC, and that this Honorable Court deny Judgment Debtor's Motion in all other respects.

Respectfully submitted,

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/s/  
Andrew Radding (Bar No. 00195)  
Michael R. Severino (Bar No. 25204  
Adelberg, Rudow, Dorf & Hendl, LLC  
600 Mercantile Bank & Trust Bldg.  
2 Hopkins Plaza  
Baltimore, Maryland 21201-2927  
410-539-5195

*Attorneys for Adelberg, Rudow, Dorf  
& Hendl, LLC*